

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 19-20478

v.

HON. DENISE PAGE HOOD

D-4 PAVEL STASSI,

Defendants.

**STIPULATED PROTECTIVE ORDER REGARDING
DISSEMINATION OF DISCOVERY DOCUMENTS AND/OR
INFORMATION SUBJECT TO THE PROTECTIVE ORDER**

1. The First Superseding Indictment in this case alleges the offenses of Conspiracy to Participate in a Racketeer Influenced Corrupt Organization in violation of 18 U.S.C. § 1962(d) and Conspiracy to Commit Bank Fraud in violation of 18 U.S.C. § 1349.

2. During the course of the underlying investigation, the United States obtained financial and banking records, various means of identification, identification documents, account numbers, and online banking credentials from various sources. Also gathered during the investigation were computer forensic materials and investigative reports from various jurisdictions and some of which may relate to other ongoing cases and/or investigations. All of these types of records are sensitive, may implicate the rights of third-party victims, and if

disclosed may compromise ongoing investigations in the United States and abroad.

IT IS HEREBY STIPULATED AND AGREED among the United States, Defendant Pavel STASSI, and his counsel (“the parties”), as follows:

3. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority;

4. This Order pertains to all discovery provided to and/or made available to defense counsel as part of discovery in this case (hereafter, collectively known as “the discovery”);

5. The discovery in this matter contains a large amount of personal identifying information, personal financial information (including online banking information), and data relevant to other ongoing investigations (hereinafter, “sensitive data”);

6. The parties request a protective order with regard to the discovery in this matter because the sensitive data requires special protection and its further disclosure could result in identity theft, invasion of privacy, resulting financial loss, and the compromise of ongoing investigations;

7. Defense counsel shall not disclose any of the discovery and/or information to any person and/or entity other than his/her defendant/client, and/or witnesses that defense counsel may be interviewing and/or preparing for trial

and/or attorneys, law clerks, paralegals, secretaries, experts, consultants and/or investigators involved in the representation of defense counsel's defendant/client in this case;

8. Defense counsel may show his/her defendant/client, and/or witnesses, the discovery and/or information, but shall not permit his/her respective defendant/client, and/or witnesses, to retain a copy of the discovery and/or information, or review it outside of defense counsel's presence;

9. The discovery and/or information therein may only be used in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States Government. Defense counsel will return the discovery to the Government or certify that it has been shredded and/or deleted at the conclusion of the case, except that defense counsel may keep one copy for his/her own files, subject to the security restrictions stated in this document;

10. In the event the defense seeks utilization of the discovery material in any court filing, at trial or in another hearing in this matter, defense agrees to confer with the Government to ensure that any sensitive data is redacted from the discovery prior to its use. Any filings shall be filed in compliance with Rule 49.1

of the Federal Rules of Criminal Procedure and the Electronic Filing Policies and procedures of the United States District Court for the Eastern District of Michigan.

11. Defense counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement;

12. If defense counsel makes, or causes to be made, any further copies of any of the discovery, defense counsel will inscribe the following notation on each copy: “U.S. Government Property; May Not be Used Without U.S. Government Permission”;

13. If defense counsel releases custody of any of the discovery and/or information, and/or authorized copies thereof, to any person and/or entity described in paragraph 7, defense counsel shall provide such recipients with copies of this Order and advise that person that the discovery is the property of the United States Government, that the discovery and information therein may only be used in connection with the litigation of this case and for no other purpose, and that an unauthorized use of the discovery may constitute a violation of law and/or contempt of court;

14. Defense counsel shall be responsible for advising his/her defendant/client, employees and other members of the defense team and defense witnesses of the contents of this Stipulation and Order.

15. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this order.

IT IS SO ORDERED.

DATED: August 7, 2020

s/Denise Page Hood
United States District Judge

IT IS SO STIPULATED.

So stipulated and respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney

s/Patrick E. Corbett (P41182)
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
Phone: 313- 226-9703
E-Mail: patrick.corbett@usdoj.gov

s/Louisa K. Marion (DC1005062)
Senior Counsel
U.S. Dept. of Justice, Criminal Division
Computer Crime and Intellectual Property
Section
1301 New York Ave. NW, Ste. 600
Washington, DC 20530
Phone: 202-616-5115
E-Mail: louisa.marion@usdoj.gov

s/Mark Kriger (with consent)
Mark Kriger
Attorney for D-4 Pavel Stassi
LaRene & Kriger PLC
645 Griswold St., Ste. 1717
Detroit, MI 48226-4113
Phone: 313-967-0100
E-Mail: mkriger@sbcglobal.net

Date: July 31, 2020